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13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 17 18 19 20 21 22 23	Keith H. Asbell, Plaintiff, v. Experian Information Solutions, Inc. and Trans Union LLC, Defendants.	Case No.: 2:17-cv-03122-JCM-PAL Stipulation for an extension of time for Plaintiff to Respond to Trans Union LLC's Motion to Dismiss [ECF No. 16] (First Request)
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24 Plaintiff Keith H. Asbell (“Plaintiff”) and Trans Union LLC (“Defendant”),
25 by and through their respective counsel, hereby submit this stipulation for an
26 extension of time—until **April 12, 2018**—for Plaintiff to respond to Defendant’s
27 Motion to Dismiss Plaintiff’s First Amended Complaint, filed on March 15, 2018,
28 ECF No. 16. Plaintiff’s Response is currently due on March 29, 2018.

1 Plaintiff filed his Complaint on December 27, 2017. ECF No. 1. Defendant
2 filed its motion to dismiss on February 15, 2018. ECF No. 11. On March 1, 2018,
3 Plaintiff filed his First Amended Complaint. ECF No. 15. On March 15, 2018,
4 Defendant filed its pending Motion to Dismiss Plaintiff's Amended Complaint.
5 ECF No. 16. Plaintiff's Response is due on March 29, 2018. *Id.* The Parties are
6 actively discussing resolution of the case and, in good faith and not for the purposes
7 of delay, Plaintiff has requested and Defendant has agreed to allow Plaintiff an
8 additional 14 days to respond to the Motion. The Parties in good faith stipulate to
9 allow additional time for Plaintiff to respond to the Motion. This is the first request
10 for an extension of this deadline.

11 The Parties therefore stipulate that Plaintiff's response to Defendant's motion
12 to dismiss, ECF. No. 16, shall be due on or before **April 12, 2018**.
13 DATED this 29th day of March 2018.

14 **KAZEROUNI LAW GROUP, APC**

15 By: /s/ Michael Kind
16 Michael Kind, Esq.
17 6069 South Fort Apache Road, Suite 100
18 Las Vegas, Nevada 89148
19 *Attorneys for Plaintiff*

20 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

21 By: /s/ Jason Revzin
22 Jason Revzin, Esq.,
23 6385 S. Rainbow Blvd., Suite 600
24 Las Vegas, NV 89118
25 *Attorneys for Defendant Trans Union LLC*

26 IT IS SO ORDERED:

27 
28 UNITED STATES DISTRICT JUDGE

29 March 29, 2018
30 DATED: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on March 29, 2018, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind

Michael Kind

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